

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DIBELLA ENTERTAINMENT, INC., a New York
corporation,

Plaintiff,

- against -

O'SHAQUIE FOSTER,

Defendant.

CASE NO. 21-cv-2709 (JGK)

**STIPULATION AND [PROPOSED]
ORDER OF DISMISSAL WITH
PREJUDICE PURSUANT TO
F.R.C.P. 41(a)(1)(A)(ii) and 41(c)**

STIPULATON AND [PROPOSED] ORDER OF DISMISSAL WITH PREJUDICE

WHEREAS, the parties to this action have settled this matter and released each other;

IT IS NOW HEREBY STIPULATED AND AGREED by and between the parties and/or their
respective counsel(s), and subject to the approval of the Court, as follows:

1. The above-captioned action, and any related counterclaim, crossclaim or third-party claim is
voluntarily dismissed by the parties with prejudice against each other pursuant to the Federal Rules of
Civil Procedure 41(a)(1)(A)(ii) and 41(c).

/s/ Rodney Drinnon

Rodney L. Drinnon, Esq.
MCCATHERN LAW FIRM
2000 W. Loop S., Suite 1850
Houston, Texas 77027
Tel: (832) 533-8689
Fax: (832) 213-4842
Attorneys for Defendant

/s/ Leon Margules

Leon R. Margules, Esq.
MARGULES LAW GROUP, P.A.
633 South Andrews Avenue, Suit 500
Fort Lauderdale, Florida 33301
Tel: (954) 587-0482
Fax: (954) 583-7447
Attorneys for Plaintiff

SO ORDERED on this ____ day of November 23, 2021:

Judge Hon. John G. Koeltl
United States District Court